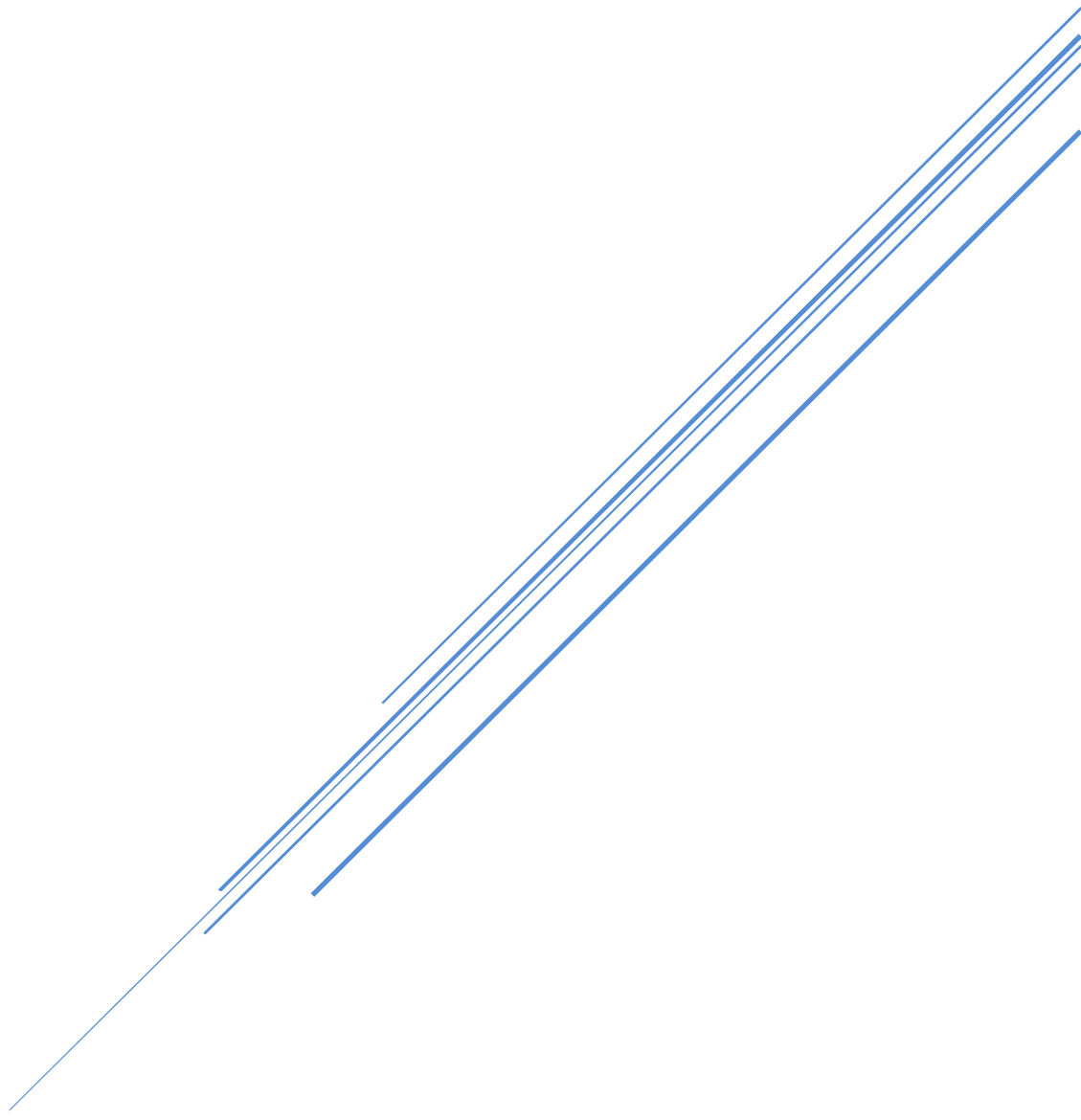




# ER-KIM GLOBAL POLICY

## CHILDS LABOR, FORCED LABOR AND YOUTH EMPLOYMENT POLICY





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## 1. INTRODUCTION

It is our policy to exhibit honest, ethical and legal behavior by adhering to the Principles of Business Ethics and related Policies and with the same ethical perspective. Company activities are carried out in full compliance with our professional and ethical business principles and local legislation.

The aim of this policy is to prevent child labor and forced labor and to promote youth employment.

## 2. SCOPE AND APPLICABILITY

This policy applies to all Members<sup>1</sup> or third parties connected with ER-KIM<sup>2</sup> in any business relationship.

In this policy, **third party** means any person or organization you come into contact with while working for ER-KIM, including actual or potential customers, suppliers, distributors, business contacts, agents, consultants, public and governmental institutions and their advisors, representatives, officials, politicians and political parties.

ER-KIM develops procedures and practices in accordance with the relevant legal legislation, United Nations International Labor Organization (UN International Labor Organization- ILO) standards and international agreements on child labor, forced labor and youth employment in all other countries where ER-KIM does business, represents and manages operations.

## 3. GENERAL RULES

Child labor; ER-KIM and the third parties it does business with do not employ child labor in any way contrary to the legal legislation. No one under the age of 15 who has not completed compulsory education should be employed, unless local laws specify a higher age limit. Workers under 18 years of age should not be employed in hazardous work or night work to meet their educational needs.

Forced Labor; Human trafficking, forced and compulsory labor is never tolerated. No employee should be required to post collateral, provide surety or place his or her identity in escrow before starting work. Employees must not be subjected to forced labor through any threats, force, false pretenses or other forms of coercion. This necessity extends to high-interest loans, involuntary bonded, indentured, slave/captive, migrant labor and other forms.

Discrimination; ER-KIM and the third parties it does business with respect and accept ethnic and cultural differences, take measures to protect and develop differences, and undertake to create working environments for its employees where there is equal opportunity, in mutual trust, without discrimination, respecting human rights.

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<sup>1</sup> "Member" or "Members" refers to the senior executives, directors, managers and employees of all Er-Kim Turkey and its affiliated companies.

<sup>2</sup> "Er-Kim" refers to Er-Kim İlaç Sanayi ve Ticaret Anonim Şirketi ("Er-Kim Turkey") and its affiliates. "Affiliate" means a company directly or indirectly controlled by Er-Kim Turkey. For the purposes of the preceding sentence, "Control" means the power to hold, directly or indirectly, a majority of the voting shares of a company, or the power to exercise, directly or indirectly, by contract or otherwise, those rights, so as to influence the management and administration of the company.



Freedom of Association and Collective Bargaining; ER-KIM and the third parties with whom it does business respect the right of its employees to unionize and their decision to become union members, and their right to organize and bargain collectively in accordance with the law.

Harassment; ER-KIM and the third parties it does business with do not tolerate any violation of the immunity of its employees in any way through physical, sexual, psychological and/or emotional harassment in the workplace or anywhere they are present for work purposes.

Remuneration; ER-KIM and the third parties with which it does business must comply with the applicable labor legislation of the country in which they do business in terms of wages, overtime and wage-related rights paid to their employees.

Working Hours; ER-KIM and third parties with whom it does business must comply with the labor legislation in force in the country in which they are located regarding working hours and leave rights and must not require employees to work more than 48 hours per week on a regular basis and more than 60 hours in total during the working week (including overtime), unless the local legislation specifies less maximum working hours and except for extraordinary business conditions. ER-KIM and its third parties must ensure that overtime is voluntary and paid in accordance with local and national laws or regulations. Employees must have at least one day off in every seven-day period, except in exceptional business circumstances.

#### **4. YOUR RESPONSIBILITIES**

All employees are responsible for the daily monitoring of this policy and compliance with its content. You must ensure that you read, understand, are trained on the issues contained herein and comply with this policy.

The prevention, detection and reporting of child labor and forced labor is the responsibility of all ER-KIM employees and Third Parties acting on behalf of ER-KIM. ER-KIM Members are obliged to prevent any activity that may contradict this policy or that is within this possibility.

#### **5. RECORD KEEPING**

All transactions carried out under this Policy are recorded in writing by the Legal and Compliance Department.

#### **6. VOICING A PROBLEM**

ER-KIM offers its support in raising any issues related to misconduct as soon as possible.

Such cases can be communicated to the following departments:

- Your First Supervisor,
- Your Department Head,
- Legal and Compliance Department



Applications can be made to the Company's Legal and Compliance Department at [etik@er-kim.com.tr](mailto:etik@er-kim.com.tr), as described in the Notification, Consultation and Whistleblowing Policy and Procedure. Alternatively, it can be reported anonymously through the Ethics Hotline ([+90 212 401 59 19](tel:+902124015919)).

## **7. TRAINING AND COMMUNICATION**

The Legal and Compliance Department is responsible for ensuring that this policy is understood and that adequate and regular training is provided on this topic. Training on this policy forms part of the orientation period for all new employees. Existing employees should receive regular training on how to implement and comply with this policy.

Those at all levels of management are responsible for ensuring that this policy is understood and that adequate and regular training is provided.

In accordance with the principle of continuous improvement, ER-KIM will be in constant communication and discussion with its employees in order to understand this Policy and to develop and improve it in the future.

## **8. MONITORING AND REVIEW**

The Legal and Compliance Department will measure and regularly monitor and review the effectiveness, appropriateness and adequacy of this policy. Any improvements to be identified will be made as soon as possible. Internal audit systems and procedures will be subject to regular audit to ensure effectiveness in combating bribery and corruption.

All employees are responsible for the success of this policy and are therefore expected to raise any suspicions of danger or misconduct. This policy does not constitute a part of the employee's employment contract and may be changed by ER-KIM at any time.


**ANNEX 1 DOCUMENT HISTORY AND VERSION CONTROL RECORD**

<b>Document Name</b>	Child Labor, Forced Labor and Youth Employment Policy
<b>Author</b>	Bilge KIYAK, Legal and Compliance Manager
<b>Approved by</b>	CEM ZORLULAR, Chairman of the Board
<b>Published by</b>	Ahu ÖZGÜR, Quality Manager
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<b>Version No</b>	<b>Version Date</b>	<b>Amendment details</b>
00	November 5, 2019	Child Labor, Forced Labor and Youth Employment Policy My First Edition
01	December 23, 2019	Changes in title and preparing party
00	May 9, 2022	The numbering system changed in accordance with DK-2022-0001. The language of the Child Labor, Forced Labor and Youth Employment Policy was simplified and revised to cover all ER-KIM Affiliates.
01	May 8, 2024	It has been reviewed and revised.